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Solutia Inc.
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Tel 314-674-1000

February 22, 1999


Mr. Michael McAteer
U. S. EPA - Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, Illinois 60604-3590

**Re: Sauget Sites Area I - January 21, 1999 Administrative Order by Consent
February 1999 Monthly Report**

Dear Mr. McAteer,

Enclosed is the February 1999 Monthly Report for the Sauget Sites Area I. This submittal is in fulfillment of the monthly requirements of Section 2.4 Reporting, of the January 21, 1999 Final Administrative Order by Consent for Sauget Sites Area I, Sauget and Cahokia, Illinois.

Sincerely,


D. M. Light
Manager, Remedial Projects

cc: T. Gouger - USACE
P. Takacs - IEPA

Mayor M. King - Cahokia
Sauget File - Solutia

Sauget Sites Area I - Sauget, Illinois

AOC - EECA / RIFS

Monthly Report

Date of Report: February 22, 1999

Period Covered: January 21, 1999 - February 19, 1999

Work Performed during the reporting period

- None

Work scheduled for next reporting period

- None

Problems and Solutions

- None

Submittal Schedule Status (see attached)

- Revised SSP submitted February 22, 1999
- February 17, 1999 request submitted to USEPA for revision to access schedule requirements

Issues under review

- **Dead Creek Flooding** - Solutia is evaluating a proposal by USEPA to design and install some early (pre-EECA/RIFS study) flooding improvements focused on the undersized or otherwise constricted culverts along Dead Creek. It is contemplated that this Work would be conducted under a UAO to be negotiated between USEPA and Solutia.
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Comments

1. The Final Administrative Order by Consent became effective January 21, 1999
2. The Support Sampling Plan (SSP) Agency comments were received January 27, 1999. A review and discussion meeting was held with the Agencies February 17, 1999. The revised SSP was submitted for Agency review February 22, 1999 along with a schedule for the Work. The revised SSP Schedule calls for the AOC Work to be completed and a Data Report issued by 12/31/99. Approval of the 12/31/99 target for the Data Report would result in AOC scheduled submittals of the EECA and RIFS of 2/29/00 and 3/30/00 respectively.
3. Access procurement is in progress.
4. Development of the Request for Proposal (RFP) for contractor bids for the Work is in progress. The RFPs for the Work will be submitted to selected contractors the week of February 22. Bid awards are scheduled for 3/15/99.

January 21, 1999 Sauget Area I AOC

SCHEDULE

- | | |
|--|---|
| 1. Designation of Contractor | February, 4, 1999 ¹ |
| 2. Designation of Other Contractors | 5 Business Days Before Start of Work |
| 3. Designation of Project Coordinator | Completed |
| 4. Submit Support Sampling Plan (SSP) | Submitted November 19, 1998 |
| 5. Submit Revised SSP | February 18, 1999 ² |
| 6. Obtain Access Agreements | February 19, 1999 ³ |
| 7. Submit Health and Safety Plan (HASP) | With SSP ⁴ |
| 8. Submit Quality Assurance and Sampling Plan (QAPP) | With SSP ⁵ |
| 9. Sampling Notification | 10 Business Days Prior to Start of Work |
| 10. Submit Data Report | <div style="border: 1px solid black; padding: 2px; display: inline-block;">12/31/99⁶</div> |
| 11. Submit EE/CA Report | 60 Calendar Days After Data Report Submittal |
| 12. Submit Revised EE/CA Report | 21 Calendar Days After Receipt of EPA Comments |
| 13. Submit RI/FS Report | 90 Calendar Days After Data |

¹ Solutia will act as the General Contractor until the SSP is approved, an RFP is processed and a contractor(s) are competitively selected (subject to approval by the Agencies).

² Revised to 2/22/99 per M. Light's 2/2/99 phone conversation with Mike McAteer. Submitted revised SSP 2/22/99.

³ Formal request for modification issued 2/13/99

✓✓ ⁴ Requested modification to "30 days after approval of the SSP", in a 2/12/99 M. Light e-mail to M. McAteer.

✓✓ ⁵ Requested modification to "30 days after approval of the SSP", in a 2/12/99 M. Light e-mail to M. McAteer.

⁶ 12/31/99 currently proposed in the February 22 submittal of the SSP - subject to final approval of USEPA.

14. Submit Revised RI/FS Report

15. Progress Reports

Report Submittal

**21 Calendar Days After Receipt of
EPA Comments**

Monthly Beginning February 19, 1999